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Committee for Purchase from People Who are Blind or Severally Disabled

Attn: G. John Heyer
1421 Jefferson Davis Highway
Jefferson Plaza 2, Suite 10800
Arlington, VA 22202-3259

Mr. Heyer:

I am writing on behalf of GTP Industries, a private nonprofit community based employment and training business located in Traverse City Michigan. GTP Industries is a JWOD- producing CRP. As such we are writing to request the "Committee" withdraw the Proposed Rules Regarding the Javits-Wagner O'Day Program, Docket # 2004-01-01.

There is no basis or rational for these rules in the JWOD Statute, regulations implementing JWOD, or the legislative history of the JWOD Act in federal case law. The Committee simply does not have the authority to impose regulations regarding executive compensation and corporate governance under the JWOD Act. Moreover, any attempt to regulate authority over the governance's standards for nonprofit (501) (c) (3) organizations duplicates legitimate government authority such as that which resides in the Internal Revenue Service.

There is no clear line demonstrating how these rules and their restrictions on nonprofit governance would directly increase employment and training opportunities for blind and disabled citizens. The proposed rules are simply out of line with the stated goals for the Committee and exceed the Committee's Congressional mandate. It makes no sense for the Committee to get involved in the issue of nonprofit governance, when in fact there are many cases such as GTP, where only a small portion of our overall budget is a result of JWOD affiliated work.

We are confused as to why the Committee feels it necessary to begin policing nonprofit organizations. Congress is dealing with the larger issue of legislation with respect to nonprofit governance and has the proper authority. In fact, Congressional legislation would cover all nonprofits, including JWOD producing CRPs. We would urge the Committee to withdraw its proposed rules and wait until Congress acts.

Once again, the Committee has made no justification as to why JWOD producing CRPs should be held to a different standard than compensation for executives at Boeing, for example, which is a large federal contractor and is not tied to a federal pay scale. With all due respect, we urge the withdrawal of the proposed rules.

Sincerely,

Steve H. Perdue
President/CEO

let_heyer.doc



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